REMARKS

Applicants appreciate the Office's review of the present application. In response to the Office Action, the cited references have been reviewed, and the rejections and objections made to the claims by the Examiner have been considered. The claims presently on file in the present application are believed to be patentably distinguishable over the cited references, and therefore allowance of these claims is earnestly solicited.

In order to render the claims more clear and definite, and to emphasize the patentable novelty thereof, claims 31 and 52 have been amended. Support for any new claims is found in the specification, drawings, and claims as originally filed, and no new matter has been added. Accordingly, all claims presently on file in the subject application are in condition for immediate allowance, and such action is respectfully requested.

Rejections

Rejection Under 35USC Section 112 First Paragraph

Claim 46 has been rejected under 35 USC Section 112, first paragraph, as failing to comply with the enablement requirement.

In response to the specific points raised by the Examiner, support for a particular one of the client devices and a particular one of the resources being located at a same network node is found in FIG. 2 (client 130 and printer 133 are located at the same network node). Support for the user interface builder providing at least part of an application program associated with the particular resource to the particular client device, for the application program being configured to control the particular resource, and for the customized user interface being configured to access the application program, is found collectively in claim 9 as originally filed; at page 6, lines 24-25 of the specification; and at page 13, lines 3-6 of the specification.

In view of the foregoing, it is submitted that the rejections under 35 USC Section 112, first paragraph, have been overcome and should be withdrawn.

Rejection Under 35USC Section 102(b)

(I) Claims 31-34, 36-39, 41-45, and 47-53

Claims 31-34, 36-39, 41-45, and 47-53 have been rejected under 35 USC Section 102(b), as being anticipated by U.S. patent 5,832,298 to Sanchez et al. ("Sanchez"). Applicants respectfully traverse the rejection and request reconsideration based on the amendment to claim 31 and features in the other claims which are neither disclosed nor suggested in the cited reference.

As to a rejection under 102(b), "[a]nticipation requires that all of the elements and limitations of the claim are found within a single prior art reference." *Scripps Clinic & Research Found. v. Genentech Inc., 18 USPQ 2d 1001, 1010 (Fed. Cir. 1991).* "[F]unctional language is, of course, an additional limitation in the claim. *K-2 Corp. v. Salomon S.A., 52 USPQ 2d 1001, 1004 (Fed. Cir. 1999) (citing Wright Med. Tech., Inc. v. Osteonics Corp., 43 USPQ 2d 1837, 1840 (Fed. Cir. 1997)).* The standard for lack of novelty, that is for "anticipation," is one of strict identity. *Schroeder v. Owens-Corning Fiberglass Corp., 514 F.2d 901, 185 U.S.P.Q. 723 (9th Cir. 1975); and Cool-Fin Elecs. Corp. v. International Elec. Research Corp., 491 F.2d 660, 180 U.S.P.Q. 481 (9th Cir. 1974).* The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).* The elements must be arranged as required by the claim. *In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).*

Independent claim 31 (amended), and its dependent claims 32-34, 36-39, 41-45, and 47-51 are patentably distinguishable over the cited reference because the Sanchez reference does not disclose all the limitations of the claims. Independent claim 31 emphasizes the novel features of the present invention by which a user interface system located at a first network node provides a customized user interface for a resource located at other than the first network node to a plurality of client devices located at second network nodes. In this regard, claim 31 recites:

"31. A network-based user interface system, comprising:

an <u>extensible resource interface located at a first network node</u> and adapted for coupling to <u>a plurality of client devices each located at one of a plurality of second network nodes different from the first network node</u>, the extensible resource interface including

a register configured to collect resource information from one or more resources located at other than the first network node;

an options module configured to provide resource options based on the resource information;

a user profiler configured to construct profiles for at least some of the client devices, each profile indicative of client-specific resource options; and

a <u>user interface builder configured to construct</u> from the resource options and a particular one of the profiles <u>a customized user interface for display by the corresponding one of the client devices and</u> further configured <u>to provide the customized user interface to the corresponding one of the client devices over the network</u>, the customized user interface indicative of the corresponding client-specific resource options." (emphasis added)

In discussing the differences between the claimed invention and the Sanchez

reference, the following descriptions in the specification of claim terms are as noted below:

- <u>client devices</u>: "The clients 130 may be computers, such as personal computers (PC) and Macintosh computers, for example. The clients 130 may also be larger computer systems, including file servers, and other networked computer systems. The clients may be personal digital assistants (PDAs) or similar hand-held computing technology" (page 6, lines 20-23).

- <u>resources</u>: "[T]he interface 150 may be used as an extensible, networked-based mechanism to link one or more computers or similar processors or terminals to one or more networked resources." (page 6, lines 8-13). "The description provided above relates to a dynamic user interface operating to support print options. However, a similar structure may be used to support other networked operations. Examples of such networked operations include processing and delivery of electronic mail, facsimile transmission and printing, and other operations in which a networked computer may interact with remote resources to provide a service for the networked computer." (page 14, line 29 – page 15, line 4).

Therefore, in the context of the Sanchez reference, client devices are computing equipment 11 or laptop computer 12. The resource is digital copier 16 (Sanchez, FIG. 1).

<u>(A) Sanchez does not anticipate a user interface builder at one network node that constructs a customized user interface for a client device at a different network node, and that provides the customized user interface to the client device over the network so that it can be</u>

displayed by the client device.

The Sanchez reference discloses "an adaptive graphical user interface of a current configuration and current capabilities of a networked peripheral device connected to a local area network" (Abstract). As is described in the Sanchez reference:

"According to the present invention, printer/facsimile driver 40 includes a software program, copier user interface dynamic link library (copier UIDLL) 65 shown in FIG. 4, which includes process steps to interrogate digital copier 16 for its current configuration, status and capabilities. Copier UIDLL 65 also includes libraries of copier configuration graphical images and commands, copier capabilities graphical images and commands, and libraries of user-selectable job options corresponding to configuration and capabilities of digital copier 16. Based on these libraries, copier UIDLL 65 generates and displays the current configuration and status of digital copier 16 in a graphical user interface display (to be discussed below in greater detail). The graphical user interface display not only contains a graphical representation of digital copier 16 in its current configuration, but also displays the appropriate job options which can be selected based on the current configuration and current capabilities of digital copier 16.

Thus, upon instruction from the user at the user's work station, such as computing equipment 11, copier UIDLL 65 sends a request to dynamic configuration dynamic link library (dynamic config DLL) 56 to interrogate digital copier 16 to obtain a current configuration of digital copier 16 and to obtain information relating to the capabilities of digital copier 16 at that specific time and to return that information to copier UIDLL 65. In this regard, dynamic config DLL 56 returns information or data regarding current configuration and capabilities of digital copier 16, but it is also to be understood that dynamic config DLL 56 could also return instructions to copier UIDLL 65 as to how copier UIDLL 65 should create, build and display the graphical user interface, i.e., vector graphic commands, fill patterns, geometric positional commands, bitmap identifications of bitmaps to be used, etc. When the user needs to access digital copier 16, such as when printing or scanning, copier UIDLL 65 displays to the user a graphical user interface which includes a representative graphical image of digital copier 16 with the graphical image indicating the current configuration at the specific moment the interrogation was answered by digital copier 16." (col. 7, line 45 – col. 8, line.17)."

The above-cited section from the Sanchez reference clearly discloses that, unlike the limitations of Applicants' claim 31, the customized user interface that is displayed on computing equipment 11 is also built on computing equipment 11. Copier UIDLL 65 and dynamic config DLL 56 are modules of printer/fax driver 40 which is stored on disk 31 of

computer equipment 11, and which is executed on computing equipment 11 (FIGS. 2,4). All that is transferred over the network is the data regarding the current configuration and capabilities of digital copier 16. It is copier UIDLL 65 and/or dynamic config DLL 56, executing on computing equipment 11, that create, build, and display the graphical user interface on computing equipment 11.

The novel features of the present invention are not anticipated by the Sanchez reference at least in that a user interface builder configured to construct a customized user interface for display by a client device, and to provide the customized user interface to the client device over the network, is absent from the Sanchez reference. Therefore, the rejection is improper at least for this reason and should be withdrawn.

(B) Sanchez does not anticipate an extensible resource interface at a first network node that is adapted for coupling to a plurality of client devices each located at one of a plurality of second network nodes different from the first network node

As explained above with respect to point (A), the user interface of the Sanchez reference was both built on, and displayed on, computing equipment 11. Apparently it could alternatively have been built on, and displayed on, laptop computer 12, since the Sanchez reference discloses that "[t]he present invention can be embodied in any one of computers 11 or 12." (col. 5, lines 18-19; emphasis added). However, unlike the recitation of Applicants' claim 31, there is absolutely no disclosure in the Sanchez reference that the user interface can be built by an extensible resource interface located at one network node (for example, on computing equipment 11) but then displayed on a client device at a different network node (for example, on laptop computer 12). Such is not possible for even one client device at a different network node, much less for a plurality of client devices at a plurality of different network nodes as recited in claim 31.

Accordingly, there is no anticipation by the Sanchez reference of an extensible resource interface at a first network node that can be coupled to a plurality of client devices each at second network nodes different from the first network node Therefore, the rejection is

improper at least for this reason and should be withdrawn.

(II) Claims 52-53

Claims 52-53 have been rejected under 35 USC Section 102(b), as being anticipated by U.S. patent 5,832,298 to Sanchez et al. ("Sanchez"). Applicants respectfully traverse the rejection and request reconsideration based on the amendment to claim 52 and features in the other claims which are neither disclosed nor suggested in the cited reference.

Independent claim 52 (amended), and its dependent claim 53 are patentably distinguishable over the cited reference because the Sanchez reference does not disclose all the limitations of the claims. Independent claim 52 emphasizes the novel features of the present invention by which a user interface system located at a first network node provides a customized user interface for a resource located at other than the first network node to a plurality of client devices located at second network nodes. In this regard, claim 52 recites:

52. A network-based user interface system, comprising:
an <u>extensible resource interface located at a first network node</u> and adapted for coupling to <u>a plurality of client devices each located at one of a plurality of second network nodes different from the first network node</u>, the extensible resource interface including
means for collecting resource information from one or more resources located at other than the first network node; and
means for <u>providing over the network from the extensible resource interface</u> to a particular one of the client devices a <u>customized user interface for a particular one of the resources</u>, the customized user interface based on the resource information and on user preferences associated with the particular one of the client devices, the customized user interface further <u>displayable by the particular one of the client devices</u>.

For similar reasons as explained heretofore with reference to claim 31, the Sanchez reference does not anticipate means for providing over the network from the extensible resource interface to a client device a customized user interface for a resource that is displayable by the client device, nor does it anticipate an extensible resource interface at a first network node that can be coupled to a plurality of client devices each at second network nodes different from the first network node. Therefore, the rejection is improper at least for these reasons and should be withdrawn.

Rejection Under 35USC Section 103

Claim 35 has been rejected under 35 USC Section 103(a), as being unpatentable over U.S. patent 5,832,298 to Sanchez et al. ("Sanchez") in view of U.K. patent application GB 2347766A by Wilson ("Wilson"). Applicants respectfully traverse the rejection and request reconsideration based on the dependence of this claim on independent claim 31, whose reasons for allowability over the Sanchez reference have been discussed heretofore and against which the Wilson reference has not been cited. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Claim 40 has been rejected under 35 USC Section 103(a), as being unpatentable over U.S. patent 5,832,298 to Sanchez et al. ("Sanchez") in view of U.S. patent 6,232,968 by Alimpich et al. ("Alimpich"). Applicants respectfully traverse the rejection and request reconsideration based on the dependence of this claim on independent claim 31, whose reasons for allowability over the Sanchez reference have been discussed heretofore and against which the Alimpich reference has not been cited. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Claim 46 has been rejected under 35 USC Section 103(a), as being unpatentable over U.S. patent 5,832,298 to Sanchez et al. ("Sanchez"). Applicants respectfully traverse the rejection and request reconsideration based on the dependence of this claim on independent claim 31, whose reasons for allowability over the Sanchez reference have been discussed heretofore. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Conclusion

Attorney for Applicant(s) has carefully reviewed each one of the cited references made of record and not relied upon, and believes that the claims presently on file in the subject application patentably distinguish thereover, either taken alone or in combination with one another.

Therefore, all claims presently on file in the subject application are in condition for

immediate allowance, and such action is respectfully requested. If it is felt for any reason that direct communication with Applicant's attorney would serve to advance prosecution of this case to finality, the Examiner is invited to call the undersigned Robert C. Sismilich, Esq. at the below-listed telephone number.

AUTHORIZATION TO PAY AND PETITION
FOR THE ACCEPTANCE OF ANY NECESSARY FEES

If any charges or fees must be paid in connection with the foregoing communication (including but not limited to the payment of an extension fee or issue fees), or if any overpayment is to be refunded in connection with the above-identified application, any such charges or fees, or any such overpayment, may be respectively paid out of, or into, the Deposit Account No. 08-2025 of Hewlett-Packard Company. If any such payment also requires Petition or Extension Request, please construe this authorization to pay as the necessary Petition or Request which is required to accompany the payment.

Respectfully submitted,

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